

March 20, 2025

VIA ECF FILING AND MESSENGER DELIVERY

Hon. Lewis A. Kaplan
United States Court House, Worth Street Entrance
200 Worth Street
New York, NY 10007

Re: ***Forefront Management, LLC, et al. v. Vergilis-Kalner, et al.,***
Case No. 24-cv-8189

Dear Judge Kaplan:

We represent Plaintiffs in the above-captioned case. We are writing jointly with counsel for Defendants to address the Court's March 18, 2025 Order (ECF 35), which set Defendants' pending Motion to Dismiss the Amended Complaint for oral argument on April 2, 2025 at 11:00 a.m.

Lead counsel for Plaintiffs who will presenting their oral argument (Andrew P. Shelby) is not available for oral argument on April 2. Therefore, the parties jointly and respectfully request that the Court adjourn the oral argument and reschedule it for a date shortly thereafter that is convenient to the Court. Counsel for all parties are available for oral argument April 8 through 10 and after April 23.

This is the second request for an adjournment in this case. The parties previously requested an adjournment of the Scheduling and Initial Pretrial Conference, which the Court granted. (ECF 17 & 18.)

Sincerely,



Andrew P. Shelby, one of the attorneys for
Plaintiffs

cc: All Counsel of Record (via ECF and email)